

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 1:16-cv-10105-DJC

ANDRE BISASOR,)
PLAINTIFF,)
)
VS.)
)
DANSLAV SLAVENSKOJ,)
HARVARD EXTENSION SCHOOL/)
HARVARD UNIVERSITY, ROBERT)
H. NEUGEBOREN, MICHAEL)
SHINAGEL, HUNTINGTON)
LAMBERT, SHIRLEY R. GREENE,)
MARGARET C. ANDREWS, ASHLEY)
R. POLLOCK, PHILIP HARDING,)
KRISHAN ARORA, KEN VEDAA,)
JENNIFER WEBB, JOHN AND JANE)
DOE, AND AFFILIATED COMPANIES)
OF EXTENSIONSTUDENT.COM,)
DEFENDANTS.)
_____)

DEFENDANTS, ASHLEY R. POLLOCK, PHILIP HARDING
AND KRISHAN ARORA'S MOTION TO REMAND
PURSUANT TO 28 U.S.C §§ 1334(c)(1), 1447(c), AND 1452(b)

Defendants, Ashley R. Pollock, Philip Harding and Krishan Arora (collectively, Pollock, Harding and Arora) move that the court remand this action to the Massachusetts Superior Court for Suffolk County.

As grounds for this motion, Defendants, Pollock, Harding and Arora hereby adopt and join in the factual background and legal arguments set forth in the Memorandum of Law in Support of the Motion to Remand the Defendants President and Fellows of Harvard College (Misnamed in the Amended Complaint as "Harvard Extension School/Harvard University"), Robert H. Neugeboren, Michael Shinagel, Huntington Lambert, Shirley R. Greene, and Margaret C. Andrews filed on or about February 19, 2019

WHEREFORE, the defendants Pollock, Harding and Arora respectfully request that this Honorable Court (a) find that removal was untimely and remand this action to the Massachusetts Superior Court for Suffolk County (b) equitably remand this action to the Massachusetts Superior Court pursuant to 28 U.S.C. § 1334(c)(1) and remand this action to the Massachusetts Superior Court and (d) grant such further relief as it deems just.

Defendants,

PHILIP HARDING, ASHLEY POLLOCK
AND KRISHAN ARORA,

By their attorneys,

/s/ Joseph P. Dever

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Dated: February 23, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a copy of the foregoing to be served upon each of the following non-ECF registered parties via first class mail, postage prepaid:

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Dated: February 23, 2016